

TSD File Inventory Index

Date: September 12, 2002

Initial: CMK/ewas

Facility Name: <u>UCAR Graph-Tech, Inc.</u>			
Facility Identification Number: <u>DHD 004 167 383</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
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.1 Correspondence	<u>y</u>	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	<u>y</u>	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	<u>y</u>	<u>See C.2</u>	
.4 Financial Insurance (Sudden, Non Sudden)	<u>y</u>	C.2 Compliance/Enforcement	
		<u>C.2</u>	<u>1</u>
.5 Change Under Interim Status Requests		.1 Land Disposal Restriction Notifications	
		<u>C.2.1</u>	<u>1</u>
.6 Annual and Biennial Reports		.2 Import/Export Notifications	
	<u>x</u>	C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
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.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
<u>A.4.1 - A.4.5</u>	<u>1</u>	<u>D.1.4</u>	<u>1</u>
.2 Closure/Post Closure Plans, Certificates, etc	<u>1</u>	D. 2 Corrective Action/Facility Investigation	
<u>A.4.4</u>			
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
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.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
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.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
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.6 CMS Progress Reports		.1 Human/Ecological Assessment	
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Note: Transmittal Letter to Be Included with Reports.

Comments: _____

AUG 11 1989

5HR-12

Mr. Nyle Hillson
UCAR Carbon Company, Inc.
P.O. Box 94637
Cleveland, Ohio 44101

Re: Compliance Letter
UCAR Carbon Company, Inc.
OHD 004 167 383

Dear Mr. Hillson:

On April 5, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California list wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal requirements found at 40 CFR Part 268.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Mr. Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Greg Taylor, NEDO

bcc: Sally Swanson, REB

5HR-12 carlson:pw:6-8093::DISK "A" :FILENAME: Hillson

8/9
pcw

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	mtc 8/9/89	SKS 8/9/89	



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087
(616) 425-9171

Richard F. Celeste
Governor

April 25 1989

RE: UCAR CARBON COMPANY, INC.

OHD 004-167-383
02 18-0132
CUYAHOGA COUNTY
G/TSD

11709 Madison Ave

Nyle Hillson
UCAR Carbon Company, Inc.
P. O. Box 94637
Cleveland, Ohio 44101

Dear Mr. Hillson:

The purpose of this letter is to summarize the results of my recent RCRA inspection of your facility, which occurred on April 5, 1989. This inspection was conducted in order to determine your facility's compliance with state and federal hazardous waste rules and regulations. Terry Wilkinson, Tony Passalacqua and yourself represented UCAR, Marian Toumazos and I represented the Ohio EPA.

You indicated during the inspection that the "Karbate" production line was sold off to another company in June of 1988. The facility has also recently submitted, for formal agency review, closure plans for the hazardous waste tank and hazardous waste container storage areas.

During my inspection the following violations were noted:

1. Several facility personnel did not receive the required annual training as required by OAC 3745-52-34(A)(4) and 40 CFR 262.34, as well as OAC 3745-65-16(C) and 40 CFR 265.16(C).
2. In the satellite accumulation area the drum containing hazardous wastes was not stored closed as required by 40 CFR 265.173 and OAC 3745-66-73, as well as OAC 3745-52-34(C)(1)(a) and 40 CFR 262.34(c)(1)(i).
3. Facility must forward a copy of the facility's contingency plan to the state emergency service authorities as required by OAC 3745-65-53(B) and 40 CFR 265.53(b).
4. The facility did not indicate in the waste analysis plan the test methods use to analyze the parameters specific to the hazardous wastes generated by the facility as required by OAC 3745-65-13(B)(2) and 40 CFR 265.13(b)(2).
5. The secondary containment system for the hazardous waste tank is not designed to contain 100% of the capacity of the tank as required by 40 CFR 265.193(e)(1)(i) and OAC 3745-6693(E)(1)(a).

Page Number 2
April 25, 1989
Nyle Hillson

Ohio EPA
NEDO

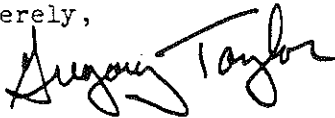
6. The hazardous waste tank system is not provided with a leak detection system as required by 40 CFR 265.193(c)(3) and OAC 3745-66-93(C)(3).
7. Precipitation accumulation in the hazardous waste tank secondary containment system was not removed as required by 40 CFR 265.193(c)(4) and 3745-66-93(C)(4).
8. The facility did not provide documentation of the annual tank integrity examination as required by 40 CFR 265.193(i)(2) and 3745-66-93(i)(2).

Please address the above violations and submit related documentation to this office within 30 days of receipt of this letter.

Please note that the Land Ban Restriction Inspection, completed as part of this inspection is being forwarded to the U.S. EPA, Region V for appropriate follow-up.

If you have any questions concerning the requests or violations cited in this letter, please feel free to contact me at (216) 425-9171.

Sincerely,



Gregory Taylor
Environmental Scientist
Division of Solid and Hazardous Waste
Management

GT/sp

cc: ☒ Dave Sholtis, DSHWM, Central Office
Debby Berg, DSHWM, NEDO

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: UCAR Carbon Co.

U.S. EPA I.D. No.: OH 004 167 383

Street: 11709 Madison Ave. P.O. Box 6087

City: Cleveland State: Ohio Zip Code: 44101

Telephone: (216) 529-3751

Operator: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 4/5/89 Time: 9:30 - 3:30 Weather Conditions: Cloudy

Name Affiliation Telephone

Inspectors: Gregory Taylor OEPA (216) 425-9171

Marian Toumazos OEPA (216) 425-9171

Facility Representatives: Nyle Hillson, Tony Passalacqua

Terry Wilkinson

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>✓</u>	<u>✓</u>	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>						
1.	F001	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
2.	F002	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3.	F003	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
4.	F004	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5.	F005	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Cadmium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Chromium VI	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Lead	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Mercury	20 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Nickel	134 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Selenium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Thallium	130 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047°	_____	_____	_____	_____	_____
K048°	_____	_____	_____	_____	_____
K049°	_____	_____	_____	_____	_____
K050°	_____	_____	_____	_____	_____
K051°	_____	_____	_____	_____	_____
K052°	_____	_____	_____	_____	_____
K060°	_____	_____	_____	_____	_____
K061°	_____	_____	_____	_____	_____
K062°	_____	_____	_____	_____	_____
K069°	_____	_____	_____	_____	_____
K071°	_____	_____	_____	_____	_____
K073°	_____	_____	_____	_____	_____
K083°	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086°	_____	_____	_____	_____	_____
K087°	_____	_____	_____	_____	_____
K099°	_____	_____	_____	_____	_____
K100°	_____	_____	_____	_____	_____
K101°	_____	_____	_____	_____	_____
K102°	_____	_____	_____	_____	_____
K103°	_____	_____	_____	_____	_____
K104°	_____	_____	_____	_____	_____
K106°	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. MSDS

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

NA

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing ☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☐ Yes ☐ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☐ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes _____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: Safely Kleen

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *NA*

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]? ☐ Yes ☐ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? ☐ Yes ☐ No

Addresses ☐ Yes ☐ No

Telephone Numbers ☐ Yes ☐ No

Contact dates ☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? 1989

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Safety Kleen - WPS (Waste Profile Sheets)

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☐ No *NA*

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes ☒ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes ☒ No _____ NA

Last Time Late in 1987

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments? *NA*

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? *NA*

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal *NA*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

___ Yes ___ No
___ Yes ___ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

___ Yes ___ No
☒ Yes ___ No
___ Yes ___ No
___ Yes ___ No
___ Yes ___ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___ Yes ___ No

If yes, list the constituents.

(b) Are the constituents used for degreasing/cleaning?

☒ Yes ___ No

If yes, list the constituents.

M.E.K., Acetone, 111 Trichloroethane

(c) Are the constituents used as diluents?

___ Yes ___ No

If yes, list the constituents.

(d) Are the constituents used as extractants?

☒ Yes ___ No

If yes, list the constituents.

Methanol

(e) Are the constituents used for fabric scouring?

 Yes No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

 Yes No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) Yes No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: UCAR Carbon Co Date of Inspection 4/5/89
 Address: 11709 Madison Ave. Cleveland, 44101 HWFB #: 02-18-0132
P.O. Box 6087 USEPA ID #: OH0004167383
 County: Cuyahoga Facility Phone #: (216) 529-3751
 Facility Contact: Nyle Hillson Facility Contact Phone#: (216) 529-3751
 Safety Equipment #: _____
 Inspector(s) Name(s): Greg Taylor, Marian Trumazos

STATUS

Cond. Ex. SQG _____ SQG _____ Generator ☒ Transporter _____ Treatment _____ Storage ☒ Disposal _____

ACTIVITIES

Containers ☒ Tanks ☒ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile _____ Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- | | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|----|--|---------------|-----------------|
| 1. | Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | _____ |
| 2. | Are they : | | |
| a. | Abandoned(disposed; incinerated; accumulated, stored, or treated prior to disposal)? | <u>Y</u> | _____ |
| b. | Recycled? | <u>N</u> | _____ |
| c. | Inherently waste-like?(F020, F021, F022, F023, F026, F028)? | <u>N</u> | _____ |
| 3. | If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. | Used in a manner constituting disposal? | <u>NA</u> | _____ |
| b. | Burned for energy recovery? | _____ | _____ |
| c. | Reclaimed? (Refer to Table 1 of 3745-51-02) | _____ | _____ |
| d. | Accumulated speculatively? | _____ | _____ |
| 4. | Is the material recycled by being: | | |
| a. | Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>NA</u> | _____ |
| b. | Used as an effective substitute for commercial products? | _____ | _____ |
| c. | Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | _____ | _____ |

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	_____
6.	Has the facility submitted a Part A to Ohio?	<u>Y</u>	_____
7.	If yes, is it complete and accurate?	<u>Y</u>	_____
8.	If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	<u>NA</u>	_____
9.	Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>N</u>	_____
10.	Has the facility submitted a Part B?		_____
11.	Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>2 weeks</u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Hazardous wastes are presently being generated in three areas:

- Boron Nitride Production - waste Methanol (F003) 30-40 drums per year.
- Grafoil Process - waste MEK & "Bondmaster Cement" (F005)
- Maintenance - Stoddard Solvent (D001) 1-2 drums per year

Waste are removed by Safety Kleen

Note that The "Karbate" process line was discontinued as was the paint generated wastes.

4C 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG?
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?

Y _____

N _____

Y _____

NA _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

		Y/N/NA	REMARK #
6.	Does the generator meet the following hazardous waste pre-transport requirements:	_____	_____
a.	Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	<u>Y</u> _____	_____
b.	Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	<u>Y</u> _____	_____
c.	Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	<u>Y</u> _____	_____
7.	Does the generator import or export hazardous waste?	<u>N</u> _____	_____
	If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	_____	_____
8.	If the generator elects to accumulate hazardous waste on-site in <u>containers or tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a.	The containers or tanks are clearly marked with the words "Hazardous Waste"?	_____	_____
b.	The date that accumulation began is clearly marked on each container?	_____	_____
c.	If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist.	_____	_____

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist. Y _____
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? Y _____
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA _____
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77? N Open burning
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? NA _____
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days? NA _____
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days? NA _____
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? NA _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	<u>N</u>	<u>Annual Training</u>
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	<u>Y</u>	<u> </u>
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	<u>Y</u>	<u> </u>
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete " <u>Preparedness and Prevention</u> " and " <u>Contingency Plan and Emergency Procedures</u> " checklists.	<u>Y</u>	<u> </u>

REMARKS, GENERATOR REQUIREMENTS

1C 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u>Y</u>	_____
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	<u>N</u>	<u>Test Methods</u>
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>N</u> *	_____
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u>N</u>	_____
IF BOTH 3A and 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.			
4.	Does the facility have -		
	a. A 24-hour surveillance system, or	<u>Y</u>	_____
	b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	<u>Y</u>	_____
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)](265.14(c))	<u>Y</u>	_____
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>Y</u>	_____

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Container Storage Areas A&B are fenced; Area C has not been used since 1982.
The facility is enclosed by a fence and has a surveillance system

Y/N/NA REMARK #

- | | | | |
|----|---|-----------|-------|
| b. | Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] (265.15(b)(4)) | <u>NA</u> | _____ |
| 7. | Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (265.16(a)(b)(c)) | <u>Y</u> | _____ |
| 8. | Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records. (265.16(d)(e)) | <u>Y</u> | _____ |
| 9. | If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements?
[3745-65-17](265.17) | | _____ |
| a. | Protection from sources of ignition. | <u>Y</u> | _____ |
| b. | Physical separation of incompatible waste materials. | <u>Y</u> | _____ |
| c. | "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. | <u>Y</u> | _____ |
| d. | Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)) | <u>NA</u> | _____ |

C 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	_____
2. Has there been a fire, explosion or non-planned release of waste at the facility?	<u>N</u>	_____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
a. Internal alarm system?	<u>Y</u>	_____
b. Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	_____
c. Portable fire control equipment?	<u>Y</u>	_____
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	_____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	_____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	_____
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>Y</u>	_____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	_____

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA _____

C 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? N _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.51(f))? Y _____
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) N _____
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) Y _____
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y _____
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) NA _____

C 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQ~

QUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
 - c. The estimated (or actual) weight, volume or density of the waste material?
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73(B)(2) (Part 265, Appendix I, Table 2)
 - e. The present physical location of each hazardous waste within the facility?
 - f. Records of incidents which require implementation of the Contingency Plan?
 - g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))
 - h. Records of any waste analyses and trial tests required to be performed?
 - i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?
 - j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>NA</u>	<u> </u>
<u>NA</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>Y</u>	_____
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	<u>Y</u>	_____
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	<u>NA</u>	_____
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	_____	_____
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	_____	_____
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	<u>NA</u>	_____
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u>NA</u>	_____

C.C. 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	_____	_____
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.11.	_____	_____
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).	_____	_____
c.	An estimate of the maximum amount of hazardous waste in inventory.	_____	_____
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	_____	_____
e.	The year closure is expected to begin and a schedule for the various phases of closure.	_____	_____
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	_____	_____
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which effects the closure plan? [3745-66-12(C)] (265.112(c))	_____	_____
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process or 45 days if only have tanks, container storage or incinerator? [3745-66-12(D)] (265.112(d))	_____	_____
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	_____	_____

Facility recently submitted the ^{- 28 -}closure plan for review

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	_____	_____
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	_____	_____
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	_____	_____
8.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	_____	_____
9.	If closure was partial, list the regulated units which remain in use at the facility: _____ _____	_____	_____
10.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	_____	_____
11.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	_____	_____
	b. A description of planned maintenance activities?	_____	_____
	c. The name, address and phone number of person/office to contact during the post-closure period?	_____	_____
12.	For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	_____	_____

Y/N/NA REMARK #

13.~96Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
- b. Land use is restricted pursuant to 3745-66-17?
 [3745-66-10] (265.119)

3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	<u>N</u>	<u>Satellite Accumulation Area</u>
b. In good condition [3745-66-71] (265.171)?	<u>Y</u>	_____
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	_____
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	<u>*</u> _____
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>Y</u>	_____
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>Y</u>	_____
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	_____
6. Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>NA</u>	_____

AC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat hazardous wastes containing no free liquids and that are inside a building with an impermeable floor, the Paint Filter Liquid Test must be used to confirm the absence or presence of liquids in the waste and tanks and sumps used as part of a secondary containment system are exempt from 3745-66-93 (265.193).

For generator who store wastes in tanks for less than 90 days use items 1-5, 18 and 22-25. Except that compliance with with 3745-66-97(C) (265.197) is not required.

- | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|---|---------------|-----------------|
| 1. For existing tank systems without secondary containment that meets 3745-66-93 (265.193) standards, does the owner/operator (o/o) have a written assessment on file at the facility that meets all of the following requirement? [3745-66-91(A)(B)] (265.191(a)(b)) | <u>N</u> | _____ |
| a. It is certified by an independent Professional Engineer (P.E.). | _____ | _____ |
| b. Design standards have been considered. | _____ | _____ |
| c. The characteristics of hazardous waste(s) that have been or will be handled have been considered. | _____ | _____ |
| d. Corrosion protection measures have been considered. | _____ | _____ |
| e. The age of the tank system has been estimated or documented. | _____ | _____ |
| f. A leak test for non-enterable underground tanks has been conducted. | _____ | _____ |
| g. A leak test or an internal inspection by qualified P.E. has been conducted for <u>other than</u> non-enterable underground tanks. | _____ | _____ |
| 2. For tanks used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c)) | <u>NA</u> | _____ |

Y/N/NA REMARK #

3. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 [3745-66-91(D)] (265.191(d))

4. For new tank systems, has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following? [3745-66-92(A)] (265.192(a))
 - a. Design standards
 - b. The characteristics of hazardous waste to be stored or treated
 - c. Corrosion protection
 - d. Protection from vehicular traffic
 - e. Adequacy of tank foundation, proper anchoring and effects of front leave.

5. Does the o/o have on file at the facility, written statements, by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:
 - a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))
 - b. Proper backfilling; [3745-66-92(C)] (265.192(c))
 - c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))
 - d. Proper support and protection of auxiliary equipment; [3745-66-92(E)] (265.192(e))
 - e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))

NA _____

NA _____

NA _____

Y/N/NA REMARK #

6. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Director) (Administrator). If yes, skip items 7 through 11. N _____
7. Has the o/o installed secondary containment which meets the requirements of 3745-65-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)
- a. For all new tank systems prior to being put into service _____
 - b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989. _____
 - c. For existing tank system of known and documentable age, the later of January 12, 1989, or when the tank reaches 15 years of age. N _____
 - d. For existing tank systems of undocumentable age, by January 12, 1995 unless the facility is greater than seven years old before the facility is fifteen years old. _____
 - e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989. _____
8. Was the secondary containment system(s) at the facility designed, installed and is operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids. [3745-66-93(B)] (265.193(b)) N _____

Y/N/NA REMARK #

9. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C)] (265.193(c)):
- a. It is constructed or lined with compatible materials with sufficient strength to prevent failure. Y _____
 - b. It is placed on a foundation or base capable of providing support. Y _____
 - c. A leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours or at earliest practicable time is provided. N _____
 - d. It is sloped or designed to drain and remove liquid, liquid (including accumulated precipitation) is removed within 24 hours or in a timely manner. N _____

10. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? Liner _____

a. External Liner

- 1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? N _____
- 2. Is the external liner designed and operated to prevent run-off and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Y _____
- 3. Is the external liner free of cracks and gaps? Y _____
- 4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release? N _____

Y/N/NA REMARK #

b. Vault System

1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
3. Are chemically resistant water stops in place at all joints?
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?
6. Is the vault system provided with an exterior moisture barrier?

NA _____

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

NA _____

11. Is ancillary equipment provided secondary containment and inspection daily (except above ground piping)?

X _____

		Y/N/NA	REMARK #
12.	For tank systems for which secondary containment is not yet provided, does the o/o have on file at the facility a record of the following:		
a.	For non-enterable underground tanks, a leak test conducted at least annually.	NA	
b.	For all other tanks, an annual leak test or internal inspection by an independent P.E., and		
c.	For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))		
13.	Has the o/o of a tank system <u>with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control</u> complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed?	NA	
14.	Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and <u>has migrated from the zone of engineering control</u> complied with 3745-66-96(A)(B)(C) and (D) (265.196 (a)(b)(c) and (d) and 3745-66-93(G)(4)(b) and (c) and (265.193(g)(4)(b) and (c)?	NA	
15.	Has the o/o complied with the following for all tank systems until secondary containment is provided? [3745-66-93(I)] (265.193(i))		
a.	Non-enterable underground tanks have had an annual leak test?	NA	
b.	All other tanks have had an annual leak test or an internal inspection?		

- | | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|-----|---|---------------|-----------------|
| 16. | Does the o/o have on file at the facility a results of the assessments in No. 15? [3745-66-93(I)(3)] (265.93(i)(3)) | <u>NA</u> | _____ |
| 17. | For <u>tanks found to be leaking</u> as a result of assessment in 3745-66-93(I)(1) through (3) (265 (i)(1) through (i)(3)), has the o/o complied with 3745-66-96 (265.196); [3745-66-93(I)(4)] (265.93(i)(4)) | <u>NA</u> | _____ |
| 18. | Does the o/o follow the <u>general operating requirements</u> below:
[3745-66-94] (265.94) | | |
| | a. Hazardous waste treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail. | <u>Y</u> | _____ |
| | b. The o/o uses appropriate controls to prevent spills or overflows from the system. | <u>Y</u> | _____ |
| | c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred. | <u>NA</u> | _____ |
| 19. | Has the o/o documented the inspection required in 3745-66-95 (265.195), in the operating record of the facility, including the following: | | |
| | a. Spill control equipment (daily). | <u>Y</u> | _____ |
| | b. Above ground portion of the tank (daily). | <u>Y</u> | _____ |
| | c. Data from leak detection equipment (daily). | <u>NA</u> | _____ |
| | d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily). | <u>Y</u> | _____ |
| | e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter. | <u>NA</u> | _____ |
| | f. All sources of impressed current at least bi-monthly. | <u>NA</u> | _____ |

Y/N/NA REMARK #

20. Response to leaks or spills and disposition of leaking or unfit for use tanks. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

- a. Immediately ceased flow into tank and investigated cause of release
- b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.
- c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.
- d. Immediately conducted a visual inspection of the release and prevented further migration and removed and disposed of any visible contamination of soil or surface water.
- e. Reported any release to the environment to the Director (Regional Administrator) within 24 hours unless it is less than 1 lb. and was cleaned up immediately.
- f. Submitted a report within 30 days of the release to Director (Regional Administrator).

NA _____

21. Has the o/o closed the tank system or have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))

- a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.
- b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.
- c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.

NA _____

	Y/N/NA	REMARK #
d. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	_____	_____
22. Has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	<u>NA</u>	_____
23. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	_____	_____
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	<u>X</u>	_____
c. The tank is used solely for emergencies.	_____	_____
24. If ignitable or reactive waste is stored or treated is it stored or treated in compliance with the NFPA flammable and combustible code (1971 or 1981)? [3745-65-17(B) (265.17(b)) is complied with?	<u>X</u>	_____
25. Has the o/o not placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material unless 3745-65-17(B) (265.17(b)) is complied with? [3745-66-99] (265.199)	<u>NA</u>	_____
26. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-99] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	<u>NA</u>	_____
b. Obtained written documentation or similar waste under similar operating conditions.	_____	_____

Re: DHMM
Cuyahoga County
#02-18-0132

G/TSD

STATUS 0

Richard E. Neel
Environmental Coordinator
Union Carbide Corporation
Carbon Products Division
P.O. Box 6087
Cleveland, Ohio 44101

July 28, 1983

OHR 004 167 383

Dear Mr. Neel:

On July 14, 1983, I conducted an inspection of the hazardous waste handling facilities for the Union Carbide Corporation - Carbon Products Division Plant. During the inspection, all RCRA required records and plans were reviewed and the storage areas were inspected. A copy of the inspection report is enclosed for your information. This report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management, and will also be forwarded to Mr. Jim Mayka of U.S. EPA - Region V.

The inspection report indicates that this storage facility located at the Union Carbide - Carbon Products Division Plant, 11709 Madison Avenue, Lakewood, Ohio, is at this time in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-69 and Federal Hazardous Waste Regulations 40 CFR 260-265.

Your efforts in this regard are commendable. Please feel free to call if I can be of further assistance.

Sincerely,

Deborah J. Berg, R.S.
District Inspector
Division of Hazardous Materials Management

DJB:km

Enclosure

cc: Paula Cotter, Div. of Hazardous Materials Management, Central Office
✓ Ken Westlake, U.S. EPA - Region V

7-14-83 9:30-11:45 a.m.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0132

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH D 004167383

Facility: Union Carbide Corporation Mailing: P.O. Box 6087
Carbon Products Division Address: 11709 Madison Avenue Mailing: Cleveland
State: Ohio Zip Code: 44101 County: Cuyahoga City: Norwood
Telephone: 216-226-2824

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Dick Neel</u>	<u>Environmental Coordinator</u>	<u>216-226-2824</u>
2.			
3.			

INSPECTOR(S)

1.	<u>Deborah Berg</u>	<u>District Inspector</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input checked="" type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If "yes", is it complete and accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has the facility submitted a Part B?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Storage in drums (50L) of: paint waste and water wash spray booth waste - D007
 [Storage Pads # A, B, C] spent 1,1,1-trichloroethane and sludge F001 & F002
 spent acetone and spent methanol F003
 spent toluene and spent MEK F005

laboratory waste (none currently generated) consisting of
 chlorobenzene - U037, hexachloroethane - U131,
 formaldehyde - U122, furfural - U125, tetrachloroethylene - U210,
 and trichloroethene/trichloroethylene - U228.

Storage in tank (502) of: phenolic resin/acetone/furfural & water mixture - D001
 [10,000 gallons] (rinsewater)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an <u>elementary neutralization unit</u> and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	neutralization nitric & sulfuric acid in a tank, discharge to sanitary sewer
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓	—	—	—
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with <u>Ignitable</u> , Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17):				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	—	✓	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓	—	—	alarm & paging
b) Access to telephone, radio or other device for summoning emergency assistance.	✓	—	—	—
c) Portable fire control equipment.	✓	—	—	—
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓	—	—	see previous inspection
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓	—	—	log for emergency equipment initiated
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	✓	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	✓	—	—	documented
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

- | | | | | |
|---|---|---|---|------------------|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components: | | | | |
| a) Actions to be taken by personnel in the event of an emergency incident. | ✓ | — | — | — |
| b) Arrangements or agreements with local or state emergency authorities. | ✓ | — | — | — |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | ✓ | — | — | — |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | ✓ | — | — | — |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) | ✓ | — | — | — |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) | ✓ | — | — | — |
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) | ✓ | — | — | personal changes |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) | ✓ | — | — | — |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56. | — | — | ✓ | — |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
 - j) Records of Closure cost estimates and ~~Post-Closure (DISPOSAL ONLY)~~ cost estimates required under Subpart G.

✓	—	—	good log sys.
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
✓	—	—	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes	No	N/A	Remark
-----	----	-----	--------

- The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

✓			
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NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)

		✓	
--	--	---	--

- If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))

		✓	
--	--	---	--

- Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))

		✓	
--	--	---	--

- Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.

		✓	
--	--	---	--

- If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

		✓	
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Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)

✓			
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- A description of how and when the facility will be closed. (265.112(a)(1)).

✓			
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a schedule for the various phases of closure.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<u> </u>	<u> </u>	<u> </u>	<u> </u>
b) A surety bond, or	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c) A closure letter of credit, or	<u> </u>	<u> </u>	<u> </u>	<u> </u>
d) A combination of financial mechanisms. <i>Financial Test</i>	<u>✓</u>	<u> </u>	<u> </u>	<u><i>\$45,000</i></u>

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

2. <i>liability requirements (sudden accidental occurrences)</i>	<u>✓</u>	<u> </u>	<u> </u>	<u><i>\$346 million</i></u>
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RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	—
b) In good physical condition (265.171)	✓	—	—	—
c) Compatible with the wastes stored in them (265.172)	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	—
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	—
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) ~~and are equipped with a waste feed cutoff or bypass system as required in Section 265.192(d).~~
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: ~~discharge and cutoff, monitoring equipment,~~ tank level ~~and freeboard~~ (265.194).
4. Weekly inspections are made of all tank construction materials and containment structures (265.194).
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a))
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))
 - a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).

✓ — — NOT CONTINUOUS feed

— — ✓ —

✓ — — —

✓ — — —

— — ✓ —

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— — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
7. Covered tanks used to treat or store <u>Ignitable</u> or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b))	<u>✓</u>	<u> </u>	<u> </u>	<u>Class II & III A waste</u>
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

Re: DHMM
Cuyahoga County
02-18-0132 - Union Carbide Corp.

Ohio EPA

Richard E. Neel
Environmental Coordinator
Union Carbide Corporation
Carbon Products Division
P.O. Box 6087
Cleveland, Ohio 44101

RECEIVED

AUG 12 1982

WASTE MANAGEMENT BRANCH
EPA. REGION V

August 3, 1982

Dear Mr. Neel:

Thank you for the courtesies extended by you during my June 30, 1982, inspection at the Union Carbide - Carbon Products Division Plant. Your facility was represented by yourself, Mr. Gordon Roberts, and Mr. Edwin Frye. The purpose of this inspection was to ascertain compliance with State and Federal hazardous waste management rules. A copy of the inspection report is enclosed for your information. This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management, and will also be forwarded to Ms. Kathy Homer of U.S. EPA - Region V.

The inspection report indicates that this storage facility, located at the Union Carbide - Carbon Products Division Plant, 11709 Madison Avenue, Lakewood, Ohio, 44107, was in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-58 and Federal Hazardous Waste Regulations 40 CFR 260-265.

The revised Closure Plan and Closure Cost Estimate, submitted to this office on July 16, 1982, is being returned to you at this time. Your cover letter, dated the same, has been retained and will become part of the official records. While reviewing your Closure Plan and Closure Cost Estimate, I noted that the maximum volumes of wastes were derived from your past and present storage levels. If, at any time in the future, you realize a storage level higher than those indicated, your Closure Plan and Cost Estimate should be revised accordingly.

Again, thank you for your cooperation. Should you have any further questions, please feel free to contact me or Ms. Kathy Homer at (312) 886-7435.

Sincerely,

Deborah J. Berg

Deborah J. Berg, R.S.
Environmental Scientist
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM, C.O.
Bob Fragale, HWFAB, C.O.
Kathy Homer, SIP, U.S. EPA -
Region V

DJB:km

Enclosure

RCRA Inspection Report

EPA Identification Number OHD 004167383

HWFAS Permit Number (if appropriate) 02-18-0132

Facility Name Union Carbide Corporation, Carbon Products Division

Location 11709 Madison Avenue (P.O. Box 6087, Cleveland, Ohio 44101)
~~CLEVELAND~~ Lakewood, Ohio 44107

Person(s) Interviewed	Title	Telephone
<u>Dick Neel</u>	<u>Environmental Coordinator</u>	<u>216-226-3824</u>
<u>Gordon Roberts</u>	<u>Chief Plant Engineer</u>	<u>216-226-2824</u>
<u>Edwin Frye</u>	<u>Asst. Chief Plant Engineer</u>	<u>216-226-2824</u>
Inspector(s)	Agency/Title	Telephone
<u>Deborah J. Berg, R.S.</u>	Ohio EPA <u>Envir. Scientist</u>	<u>216-425-9171</u>
	Ohio EPA	
	Ohio EPA	

Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☒ Financial Requirements
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☒ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHIO 004167583

Facility: Union Carbide Corporation Carbon Products Division Mailing: P.O. Box 6087 Address: 11209 Madison Avenue City: Cleveland
State: Ohio Zip Code: 44101 County: Cuyahoga Telephone: 216-226-2824
Facility Operator: Edwin Frye Title: Asst. Chief Plant Engineer Telephone: 216-226-2824
Facility Owner: Union Carbide Corporation Carbon Products Division Address: P.O. Box 6087
City: Cleveland State: Ohio Zip Code: 44101 Telephone: 216-226-2824
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-18-0132

Date of Inspection: 6-30-83 Time of Inspection: (Start) 10:00 AM (Finish) 2:00 PM
Advance Notification? ☐ No ☒ Yes: Scheduled 6-15-82
Weather Conditions: SUNNY Wind 70° F.'s

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>Barlen Roberts</u>	<u>Chief Plant Engineer</u>	<u>216-226-2824</u>
2. <u>Edwin Frye</u>	<u>Asst. Chief Plant Engineer</u>	<u>216-226-2824</u>
3. <u>Dick Neel</u>	<u>Environmental Coordinator</u>	<u>216-226-2824</u>
4. _____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Deborah J. Berg</u>	<u>Environmental Scientist</u>	<u>316-435-9171</u>
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001-F003 (spent 1-1-1 trichloroethane & sludge), F003 (spent acetone, spent methanol), F005 (spent toluene & MEK), laboratory wastes consisting of
U 037 (chlorobenzene), U 131 (hexachloroethane), U 132 (formaldehyde), U 135 (furfural),
U 310 (tetrachloroethene/ethylene), U 328 (trichloroethene/ethylene). Note: paint waste currently is being
b) Non-Listed Wastes: ☒ I ☐ C ☐ R ☐ T considered a F005 waste also; previously identified as F017-F019.
D001 (phenolic resin, water & acetone mixture)

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ☒ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Storage in drums & tank of characteristic & listed wastes. D001 waste is stored in a tank, all others in drums.

REMARKS, PART 1. (GENERAL INFORMATION)

Waste streams result from:

F001-F002 (1-1-1 trichlor) - degreasing operations

F003 (acetone) - waste solvent from phenolic cement cleaning operation

F003 (methanol) - leaching agent in boron nitride production

F005 (toluene, MEK) - cleanup of spray guns

U037, U131, U122, U125, U210, U228 - infrequent generation as laboratory wastes

F005 (paint waste) - previously F019-F018 → comingling of waste paint & cleanup solvents at watershed spring beach

D001 (phenolic resin, water, acetone) - from KARBATE production process

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WASTE WASTE 4 Sulfuric acid Neutralized in a tank prior to discharge to sanitary "elementary neutralization unit"
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days or less</u> without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	✓	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	✓	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	✓	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	✓	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	✓	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	<u>Personnel Training Program</u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	<u>Personnel Records</u>

RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes No N/A Remark #

_____ _____ ✓ _____

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>presently using drum storage areas A+B</i>

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes No N/A Remark #

✓

Yes No N/A Remarks

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

✓ Deal waste

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c) and 3745-56-72-C).

 ✓ Covered tank

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

✓ Level monitor

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

✓

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

 ✓

a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

 ✓ records on file

b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

 ✓

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	<u>✓</u>	<u> </u>	<u> </u>	<u>ignitable</u>
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
C: Preparedness and Prevention	F: Ground Water Monitoring	
D: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>plan amended per 7-16-82 letter attached</i>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>(same as above)</i>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24-hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>plant guards</i>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>entire plant</i>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>plant & drum storage area</i>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	✓	—	—	—
a) Inspect emergency equipment.	✓	—	—	—
b) Inspect monitoring equipment.	—	—	✓	<i>had operator on Dool tank</i>
c) Inspect security, alarm and communication devices.	✓	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	—	—	✓	—
e) Inspect containment structures (<u>dikes</u> curbs, etc.).	✓	—	—	<i>at drum storage areas</i>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	—	—	✓	—
g) Inspect hazardous waste handling/loading areas each day used.	✓	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	—	—	✓	—
i) Record of any hazardous waste discharges.	—	—	✓	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓	—	—	<i>Completed refresher</i>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓	—	—	<i>good records</i>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).				

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>alarm system</i>
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>hoses & extinguishers</i>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>city water fire line back up fire pond - 100,000 gals.</i>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>annual plant safety program</i>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-------------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35). | <u>✓</u> | _____ | _____ | _____ |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <u>✓</u> | _____ | _____ | <u>documented</u> |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B). | _____ | _____ | <u>✓</u> | _____ |

Subpart D: Contingency and Emergency

- | | | | | |
|--|----------|-------|-------|--|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components: | <u>✓</u> | _____ | _____ | _____ |
| a) Actions to be taken by personnel in the event of an emergency incident. | <u>✓</u> | _____ | _____ | _____ |
| b) Arrangements or agreements with local or state emergency authorities. | <u>✓</u> | _____ | _____ | _____ |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | <u>✓</u> | _____ | _____ | _____ |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | <u>✓</u> | _____ | _____ | _____ |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F). | <u>✓</u> | _____ | _____ | <u>practical</u> |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <u>✓</u> | _____ | _____ | <u>Followed Fire, Police, Hospital</u> |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark#</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|--|
| e) The present physical location of each hazardous waste within the facility. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| g) Records of any waste analyses and trial tests required to be performed. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>revised closure plan received 7-14-82</i> |
| 2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--|
| 3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
|---|--------------------------|--------------------------|-------------------------------------|--|

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--|
| 4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
|--|--------------------------|--------------------------|-------------------------------------|--|

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>✓</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>✓</u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>✓</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>✓</u>	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	<u>✓</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
------------	-----------	------------	-----------------

b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.

___	___	✓	___
-----	-----	---	-----

c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.

___	___	✓	___
-----	-----	---	-----

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
------------	-----------	------------	-----------------

1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)

✓	___	___	revised closure plan received 7-19-83
---	-----	-----	---------------------------------------

a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).

✓	___	___	___
---	-----	-----	-----

b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.

✓	___	___	tanks
---	-----	-----	-------

c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.

✓	___	___	individual volumes
---	-----	-----	--------------------

d) A description of steps taken to decontaminate facility equipment.

✓	___	___	based upon present volumes
---	-----	-----	----------------------------

e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.

✓	___	___	___
---	-----	-----	-----

2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.

✓	___	___	amended in response to regulatory change
---	-----	-----	--

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<u>✓</u>	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	_____	_____	<u>✓</u>	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	_____	_____	<u>✓</u>	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	_____	_____	<u>✓</u>	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	_____	_____	<u>✓</u>	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	_____	_____	<u>✓</u>	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	_____	_____	<u>✓</u>	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	_____	_____	<u>✓</u>	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	_____	_____	<u>✓</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
_____	_____	<u>✓</u>	_____

Subpart H: Financial Requirements

- . A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

<u>✓</u>	_____	_____	_____
----------	-------	-------	-------

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS



Re: Application Number 81-HW-0132
Cuyahoga County

August 26, 1981

Edwin Frye
Assistant Chief Plant Engineer
Union Carbide Corporation
Carbon Products Division
P.O. Box 6087
Cleveland, Ohio 44101

Dear Mr. Frye:

On July 22, 1981, Richard Shandross of the U.S. EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Edwin Frye.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written above the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Richard Shandross, U.S. EPA, Region V
NEDO

CERTIFIED MAIL

81-HW-0132
EPA IDENTIFICATION NUMBER
(if Applicable)

QHD004167383
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

Facility Name: Union Carbide - Carbon Products Div.

Street: 11709 Madison Ave

City: Cleveland (D) State: Ohio (E) Zip Code: 44101

Phone: (216) 226 2824 (G) County: Cuyahoga

Operator: Same as above, except street

Street: P.O. Box 6087

City: _____ (K) State: _____ (L) Zip Code: _____

Phone: _____ (N) County: _____

Owner: Same as operator

Street: _____

City: _____ (R) State: _____ (S) Zip Code: _____

Phone: _____ (U) County: _____

Date of Inspection: 7-22-81 (W) Time of Inspection (From) 1:30p (To) 4:35p

Weather Conditions: Sunny About 85°F

7-1-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
<u>Edwin Frye</u>	<u>Asst. Chief Pt. Eng.</u>	<u>(216) 226 2824</u>
<u>Larry Baker</u>	<u>Supt. of Maint.</u>	<u>(216) 226 2824</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>Richard Shandross</u>	<u>USEPA/Env. Engr.</u>	<u>(312) 886-6146</u>
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Richard Shandross</u>	<u>USEPA/Env. Engr.</u>	<u>(312) 886-6146</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|------------------------------------|---|
| <u>A.</u> Storage and/or Treatment | <u> </u> D. Incineration and/or Thermal Treatment (O and P) |
| 1. Containers (I) | |
| 2. Tanks (J) | |
| 3. Surface Impoundments (K) | <u> </u> E. Chemical, Physical, and Biological Treatment (Q) |
| 4. Waste Piles (L) | |
| B. Land Treatment (M) | |
| C. Landfills (N) | |

NOTE: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark												
(A) Has the Regional Administrator been notified regarding:																
1. Receipt of hazardous waste from a foreign source?	—	✓	—	N/A no offerte												
2. Facility expansion?	—	✓	—	N/A no expand												
(B) General Waste Analysis:																
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	265.13(b) <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>1</td><td>✓</td></tr><tr><td>2</td><td>✓</td></tr><tr><td>3</td><td>✓</td></tr><tr><td>4</td><td>✓</td></tr></table> <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>5</td><td>✓</td></tr><tr><td>6</td><td>✓</td></tr></table>	1	✓	2	✓	3	✓	4	✓	5	✓	6	✓
1	✓															
2	✓															
3	✓															
4	✓															
5	✓															
6	✓															
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—													
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	N/A no offerte recd.												
(C) Security - Do security measures include: (if applicable)																
1. 24-Hour surveillance?	✓	—	—													
2. Artificial or natural barrier around facility?	✓	—	—													
3. Controlled entry?	✓	—	—													
4. Danger sign(s) at entrance?	✓	—	—	at "B" only. Not at "D" or "C"												
(D) Do Owner or Operator Inspections Include:																
1. Records of malfunctions?	—	—	✓	1												
2. Records of operator error?	—	—	✓													
3. Records of discharges?	—	—	✓													

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>fence inspected 3 times a yr; not recorded</i>
7. Operating and structural devices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A no such eqnips</i>
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include:				<i>2 groups - handlers (10) "containers" in incident case (7)</i>
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>policy is to do so. Only 1 new employee to be trained w/in 6 mo. pretty well trained now.</i>
(F) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>incl spark proof fork truck</i>
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI Remarks

_____ ✓ _____ _____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ _____ _____

2. Telephone or 2-way radios at the scene of operations?

✓ _____ _____

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ _____ _____

(Emergency crew from maint. dept.)
- Brooms, shovels, Hi-Dri, extinguishers, SCBA, protective clothes, etc.
- drums for contain soil, equip. clothes
- emergency showers, but effluent not contained.

Indicate the volume of water and/or foam available for fire control: _____

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ _____ _____

fire exting.
- annually w/records by outside firm.
- monthly in house w/records.

2. Is emergency equipment maintained in operable condition?

✓ _____ _____

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

_____ N/A never one person in area only. _____

(E) Is there adequate aisle space for unobstructed movement?

✓ _____ _____

V. C CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI

Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

✓

✓

✓

✓

265.56

a	✓
b	✓
c	✓
d	✓
e	✓
f	✓
g	✓
h	✓
i	X
j	✓

*dual system:
emergency chief
environmental
coordinator*

*fire
police
hospital*

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI	Remarks
(P) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
 (C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
 (D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A not implemented no emerg</i>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI	Remarks
 (A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A no offsite recd</i>
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
 (B) Does the owner or operator meet requirements regarding manifest discrepancies?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

I. RECORDKEEPING - Continued

(C) Operating Record

	Yes	No	NI	Remarks
1. Does the owner or operator maintain an operating record as required in 265.73?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. The location and quantity of each hazardous waste within the facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A noth disposal</i>
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>yes inspect, analyses</i>
f. Reports detailing all incidents that required implementation of the Contingency Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A no incidents</i>
g. All closure and post closure costs as applicable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI	Remarks
(A) Closure				
1. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>missing 265.112 (a)(2), (3), (4)</i>
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is the written closure cost estimate available?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>gotten by calling LF's for estimates</i>

(B) Post closure care and use of property <i>N/A no disposal</i>				
1. Is the facility post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Is the written post-closure cost estimate available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I

USE AND MANGEMENT OF CONTAINERS

Facility Name: Union Carbide Carbon Products Div. Date of Inspection: 7-22-81

	Yes	No	NI	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>some rusting on tops but not yet significant</i>
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Yes No NI Remarks

5. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).

✓

6. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A no incompatibles

7. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

N/A no incompatibles

TANKS

Facility Name:

Union Carbide / Carbon Prod. Div.

Date of Inspection:

7-22-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

✓

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

N/A covered

3. Do continuous feed systems have a waste-feed cutoff?

N/A batch

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

N/A same matl

5. Are required daily and weekly inspections done?

✓

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

✓

very reflective tank surface to prevent heating up. pressure vented to atmosphere. Also, ignitable not in concentrated form but mixed with water.

7. Are incompatible wastes stored in separate tanks?
(If not, the provisions of 40 CFR 265.17(b) apply.)

____ N/A none _____

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

NI Rs
from Part A
and estimate
of diameter

Tank capacity: 10000 gallons

Tank diameter: about 6 feet = d
2 x 25 feet (or less)



Distance of tank from property line ~300 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

N/A

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	_____	_____	_____	_____
2. Do earthen dikes have protective covers?	_____	_____	_____	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	_____	_____	_____	_____
4. Is the freeboard level inspected at least daily?	_____	_____	_____	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	_____	_____	_____	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____

7. Are incompatible wastes stored in separate tanks?
(If not, the provisions of 40 CFR 265.17(b) apply.)

_____ N/A none

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

NI Rs

Tank capacity: 10000 gallons

Tank diameter: about 6 feet $= d$
 $2 \approx 25$ feet (or less)



from part A
and estimate
of diameter

Distance of tank from property line ~300 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

N/A

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	_____	_____	_____	_____
2. Do earthen dikes have protective covers?	_____	_____	_____	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	_____	_____	_____	_____
4. Is the freeboard level inspected at least daily?	_____	_____	_____	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	_____	_____	_____	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____

Yes No NI Remarks

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

L

NA

WASTE PILES

Facility Name: _____ Date of Inspection: _____

Yes No NI Remarks

1. Are waste piles covered or protected from dispersal by wind?

2. Is each in-coming movement of waste analyzed before being added to the waste pile?

3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? (The effective date of this provision is Nov. 19, 1981.)

4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?

6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)

7. Are piles of incompatible waste protected by barriers or distance from other waste?

*Not Inspected

M
LAND TREATMENT

N/A

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation?	_____	_____	_____	_____
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	_____	_____	_____	_____
3. Is waste analyzed according to 265.273?	_____	_____	_____	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	_____	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	_____	_____	_____	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	_____	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	_____	_____	_____	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	_____	_____	_____	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)	_____	_____	_____	_____

N
LANDFILLS

N/A

Facility Name: _____

Date of Inspection: _____

Yes No NI Remarks

(A) General Operating Requirements
Does the facility provide the following:

- | | | | | |
|---|-------|-------|-------|-------|
| **1. Diversion of run-on away from active portions of the fill? | _____ | _____ | _____ | _____ |
| **2. Collection of run-off from active portions of the fill? | _____ | _____ | _____ | _____ |
| **3. Is collected run off treated? | _____ | _____ | _____ | _____ |
| 4. Control of wind dispersal of hazardous waste? | _____ | _____ | _____ | _____ |

(**Effective 11-19-81)

(B) Surveying and Recordkeeping
Does the Operating Record Include:

- | | | | | |
|--|-------|-------|-------|-------|
| 1. A map showing the exact location and dimensions of each cell? | _____ | _____ | _____ | _____ |
| 2. The contents of each cell and the location of each hazardous waste type within each cell? | _____ | _____ | _____ | _____ |

(C) Closure and Post-Closure

- | | | | | |
|--|-------|-------|-------|-------|
| 1. Is the Closure Plan available? | _____ | _____ | _____ | _____ |
| 2. Has this plan been submitted to the Regional Administrator? | _____ | _____ | _____ | _____ |
| 3. Has closure begun? | _____ | _____ | _____ | _____ |
| 4. Is the closure cost estimate available? | _____ | _____ | _____ | _____ |

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.)	_____	_____	_____	_____
--	-------	-------	-------	-------

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements.
If not, the provisions of 40 CFR 265.17(b) apply.

	Yes	No	NI	Remarks
(E) Special Requirements for Incompatible wastes.				
Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P
INCINERATION and THERMAL TREATMENT

N/A

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

(A) Type of unit (i.e., type of incinerator or thermal treatment): _____

(B) Components and steady state condition:

Was each component at steady state prior to adding waste?

Component	Yes	No	NI	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

(A) Minimum requirements, for wastes not previously burned/treated.

	Yes	No	NI	Remarks
1. Required analyses; has an analysis been performed for the following?				
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

	Yes	No	NI	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	_____	_____	_____	_____
b. Mercury:	_____	_____	_____	_____
(B) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				

Remarks

1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI	Remarks
(A) Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
(B) Is steady state maintained or corrections attempted?	_____	_____	_____	_____
(C) Is stack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
(D) Did any stack observations made by owner or operator show a plume different than normal?**	_____	_____	_____	_____
(E) If yes to D above, were corrections made to return emissions to normal appearance?***	_____	_____	_____	_____
(F) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____

**Specify in Remarks for what period of time this was checked.

	Yes	No	NI	Remarks
(G) Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____

IV. Open Burning

(A) Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q N/A

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

Yes No NI Remarks

- | | | | | |
|---|-------|-------|-------|-------|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? | _____ | _____ | _____ | _____ |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?) | _____ | _____ | _____ | _____ |
| 3. Has the owner or operator addressed the waste analysis requirements of 265.402? | _____ | _____ | _____ | _____ |
| 4. Are inspection procedures followed according to 265.403? | _____ | _____ | _____ | _____ |
| 5. Are the special requirements fulfilled for ignitable or reactive wastes? | _____ | _____ | _____ | _____ |
| 6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) | _____ | _____ | _____ | _____ |

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of Generator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of Transporter(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Did the generator receive a signed copy of each manifest from the designated facility within 35 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A none sent

	Yes	No	NI	Remarks
1. If not, was an Exception Report submitted to the Regional Administrator?	_____	_____	_____	_____
2. Was the Exception Report submitted within 45 days of the date of the waste was accepted by the initial transporter?	_____	_____	_____	_____
(D) If an Exception Report was submitted, did it contain the following information:	N/A			
1. A legible copy of the manifest for which the generator does not have confirmation of delivery?	_____	_____	_____	_____
2. A cover letter is signed by the generator or his representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?	_____	_____	_____	_____
(E) How many manifests were checked during the inspection?	none - none sent			
(F) Describe the generators system for tracking manifests:	_____			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	_____	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	_____	_____	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	_____	_____	_____	_____

Omit Section-3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections ignitable or reactive waste located at least 15 meters (50 feet) from facility's property line?	_____	_____	_____	_____
4. If waste are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tankks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
-f. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	_____	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	_____

VIII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI	Remarks
Has the installation imported or exported Hazardous Waste?	_____	_____	_____	_____
(If answered Yes, complete the following as applicable.)				
1. Exporting Hazardous waste; has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
c. Met the Manifest requirements?	_____	_____	_____	_____
2. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	_____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM and RECORDKEEPING
(Subpart B)

	Yes	No	NI	Remarks
Are copies of the completed manifests of shipping paper(s) available for review and retained for three years?	___	___	___	

II. INTERNATIONAL SHIPMENTS

	Yes	No	NI	Remarks
(A) Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	
(B) Are signed completed manifest(s) on file?	___	___	___	

V. MISCELLANEOUS

	Yes	No	NI	Remarks
(A) Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	
(B) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	

NOTE: If (A) or (B) were answered "Yes" then the transporter is also a Generator and must comply with the Generator regulations.

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Plant was shut down for several weeks. Plant makes various industrial graphite parts. ~~Water was found in the plant~~ PS did not investigate source of waste, but on-site only. One waste storage tank, and about 40 drums containing hazardous waste.

Drum areas, while noted as A, B, and C, were not all used. Only

C was currently in use. Only B was itself fenced.

Possible Violations

265.2

14(c)

52(a) [w/r/t 56(a)]

73(b)(1), (b), (2)

112(a)(2), (a)(3), (a)(4)

<div style="display: flex; align-items: center; justify-content: center;"><div style="border: 1px solid black; padding: 5px; margin-right: 10px;">FORM 1 GENERAL</div><div style="font-size: 2em; font-weight: bold; margin-right: 10px;">EPA</div><div style="text-align: center;">U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <small>(Read the "General Instructions" before starting.)</small></div></div>		I. EPA I.D. NUMBER <div style="display: flex; justify-content: space-between; border-top: 1px solid black; border-bottom: 1px solid black;"><div style="font-weight: bold;">F O H D / 0 4 1 6 7 3 8 3</div><div style="font-weight: bold;">D</div></div>													
		GENERAL INSTRUCTIONS <small>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in areas below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</small>													
LABEL ITEMS <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">I. EPA I.D. NUMBER</div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">II. FACILITY NAME</div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">V. FACILITY MAILING ADDRESS</div> <div style="border: 1px solid black; padding: 5px;">VI. FACILITY LOCATION</div>		PLEASE PLACE LABEL IN THIS SPACE													
II. POLLUTANT CHARACTERISTICS															
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.															
SPECIFIC QUESTIONS				MARK 'X'			SPECIFIC QUESTIONS				MARK 'X'				
				YES	NO	FORM ATTACHED					YES	NO	FORM ATTACHED		
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)				15	17	18	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)				19	20	21		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)				22	23	24	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)				25	26	27		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)				28	29	30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)				31	32	33		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)				34	35	36	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)				37	38	39		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)				40	41	42	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)				43	44	45		
III. NAME OF FACILITY															
1 SKIP UNION CARBIDE CORP. CARBON PRODUCTS DIV.															
IV. FACILITY CONTACT															
A. NAME & TITLE (last, first, & title)										B. PHONE (area code & no.)					
2 ROBERTS GORDON FRYE EDWIN ASST. CHIEF PLT. ENG.										2 1 6		2 2 6		2 8 2 4	
V. FACILITY MAILING ADDRESS															
A. STREET OR P.O. BOX															
3 P O BOX 6087															
B. CITY OR TOWN										C. STATE		D. ZIP CODE			
4 CLEVELAND										OH		4 4 1 0 1			
VI. FACILITY LOCATION															
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER															
5 11709 MADISON AVE.															
B. COUNTY NAME															
6 CUYAHOGA															
C. CITY OR TOWN										D. STATE		E. ZIP CODE		F. COUNTY CODE (if known)	
6 CLEVELAND										OH		4 4 1 0 7		035	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND											
7	3	6	2	4	(specify)	GRAPHITE HEAT EXCHANGERS & PARTS					7	3	2	9	3	(specify)	GRAPHITE SHEET, PACKINGS & GASKETS				
C. THIRD										D. FOURTH											
7	3	6	2	9	(specify)	BORON NITRIDE LABWARE, SHAPES & POWDERS					7					(specify)					

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
UNION CARBIDE CORP. CARBON PRODUCTS DIV.										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE										216 226 2824									
E. STREET OR P.O. BOX																			
P O BOX 6887																			
F. CITY OR TOWN										G. STATE H. ZIP CODE									
CLEVELAND										OH 44101									
										IX. INDIAN LAND									
										Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)											
9	N	A								9	P	N	A								
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)											
9	U	N	A								9	Z									(specify)
C. RCRA (Hazardous Wastes)										E. OTHER (specify)											
9	R	N	A								9									(specify)	

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

This manufacturing plant produces: Graphite Heat Exchangers and Parts, Graphite Packing and Gaskets, Boron Nitride Labware, Shapes and Powders.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
R. G. Russel Vice President & General Manager	<i>R. G. Russel</i>	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

--

FORM
3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

FOHD 014167383 21

FOR OFFICIAL USE ONLY

APPLICATION APPROVED DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

2. NEW FACILITY (Complete Item below.)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete Item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	F
LITERS	L	TONS PER HOUR	HECTARE-METER	H	B
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	A	B
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	H	Q
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S02	1,500	G		7				
	S01	7,150	G		8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS.....P
TONS.....T

METRIC UNIT OF MEASURE CODE
KILOGRAMS.....K
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON REVERSE

IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	0	4	1	6	7	3	8	3	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

F6A/55

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). F6A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, seconds)

LONGITUDE (degrees, minutes, seconds)

4	1	2	8	0	3	3
65	66	67	68	69	70	71

0	8	1	4	6	0	1	6
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

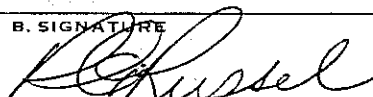
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

R. G. Russel
Vice President & General Manager



11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

RCRA INSPECTION REPORT

INTERIM STATUS STANDARDS, TREATMENT, STORAGE AND DISPOSAL FACILITIES

DEFICIENCY NOTIFICATION TABLE

ISS INSPECTION

FACILITY NO. - 81-HW-0132

OWNER - Union Carbide Corporation

FACILITY NAME - Union Carbide Corp - Carbon Products Division

FACILITY LOCATION - 11709 Madison Ave Cleveland, Ohio

FACILITY CONTACT - Edwin Frye

ISS INSPECTION DATE - July 22, 1981

PHONE NO. - 216/226-2824

COLUMN I	COLUMN II	COLUMN III	COLUMN IV	COLUMN V	COLUMN VI
Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
III A 1	3745-55-12(A)	265.12 (A)			
2					
B 1	3745-55-13	265.13			
2	3745-55-13	265.13			
3	"	"			
C 1	3745-55-14	265.14			
2	"	"			
3	"	"			
4	"	"	B	✓	
D 1	3745-55-15	265.15			
2	"	"			
3	"	"			
4	"	"			
5	"	"			
6	"	"	B	✓	
7	"	"			
8	"	"			
E 1	3745-55-16	265.16			
2	"	"			
3	"	"			
4	"	"			
5	"	"			
6	"	"			
F 1	3745-55-17	265.17			
2	"	"			
3	"	"			
IV A	3745-55-31	265.31			
B 1	3745-55-32	265.32			
2	"	"			
3	"	"			
C 1	3745-55-33	265.33			
2	"	"			
D	3745-55-34	265.34			
E	3745-55-35	265.35			
V A 1	3745-55-52	265.52			

COLUMN I

COLUMN II

COLUMN III

COLUMN IV

COLUMN V

COLUMN VI

Item No.

OAC Reference

USEPA Reference

See Code
FollowingRefer To
ISS RemarkOEPA
Use

Page

6 (Con't.)	V	A	2	3745-55-52	265.52			
			3	"	"			
			4	"	"			
			5	"	"			
7		B		3745-55-53	265.53			
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D		3745-55-56	"			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B		3745-55-72	265.72			
8		C	1	3745-55-73	265.73			
			2b	"	"	B		
			c	"	"	B		
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112	B	✓	
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142	B	✓	
		B	1	3745-56-09	265.118			
			2	"	"			
			3	"	"			
			4	3745-56-34	265.143			
	VIII	I	1	3745-56-51	265.171		✓	
			2	3745-56-52	265.172			
			3	3745-56-53	265.173			
			4	"	"			
10			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
			7	3745-56-57	265.177			
		J	1	3745-56-72	265.192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265.193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
11			7	3745-56-79	265.199			
			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
12			7	3745-57-11	265.230			

COLUMN I		COLUMN II		COLUMN III		COLUMN IV		COLUMN V	COLUMN VI
Page	Item No.		OAC Reference	USEPA Reference		See Code Following		Refer to ISS Remark	OEPA USE
12	L	1	3745-57-31	265.251					
		2	3745-57-32	265.252					
		3	3745-57-33	265.258					
		4	3745-57-36	265.256					
		5	"	"					
		6	3745-57-37	265.257					
		7	3745-57-37	265.257					
13	M	1	3745-57-52	265.272					
		2	"	"					
		3	3745-57-53	265.273					
		4	3745-57-56	265.276					
		5	3745-57-58	265.278					
		6	3745-57-58	265.278					
		7	3745-57-59	265.279					
		8	3745-57-61	265.281					
		9	3745-57-62	265.282					
14	N	A	1	3745-57-72		265.302			
			2	"		"			
			3	"		"			
			4	"		"			
	B	1	3745-57-79	265.309					
		2	"	"					
	C	1	3745-56-03	265.112					
		2	"	"					
		3	"	"					
		4	3745-56-32	265.192					
	D		3745-57-82	265.312					
			3745-55-17	265.17(b)					
15	E		3745-57-83	265.313					
			3745-55-17	265.17(b)					
	F	1	3745-57-84	265.314					
		2	"	"					
		3	"	"					
		4	"	"					
16	G		3745-57-85	265.315					
		O&P							
	I	B	1	3745-58-33		265.373			
			2	"		"			
			3	"		"			
			4	"		"			
		5	"	"					
	II	A	1a	3745-58-35		265.375			
			b	"		"			
			c	"		"			
17		2a	3745-58-35	265.375					
		b	"	"					
	B	1	"	"					
		2	"	"					
		3	"	"					
		4	"	"					
		5	"	"					

Page	COLUMN I Item No.		COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer to ISS Remark	COLUMN VI OEPA USE
17 (Con't)	III	A	3745-58-37	265.377			
		B	"	"			
		C	"	"			
		D	"	"			
		E	"	"			
		F	"	"			
		G	"	"			
	IV	A 1	3745-58-42	265.382			
		2	"	"			
19	Q	1	3745-58-51	265.401			
		2	"	"			
		3	3745-58-52	265.402			
		4	3745-58-53	265.403			
		5	3745-58-55	265.405			
		6	3745-58-56	265.406			
20	IX	I (A)	3745-52-40	262.40			
		(B) 1	3745-52-21	262.21			
		2	"	"			
		3	"	"			
		4	"	"			
		5	"	"			
		6	"	"			
		7	"	"			
		8	3745-50-42	122.6			
		(C)	3745-52-42	262.42			
21		1	3745-52-42	"			
		2	"	"			
		(D) 1	3745-52-42	262.42			
		2	"	"			
	2	(A)	3745-52-30	262.30			
		(B)	3745-52-31	262.31			
		(C)	3745-52-33	262.33			
22	3	1	3745-52-34	262.34			
		2	"	"			
		3	3745-56-54	265.174			
		4a	3745-56-72	265.192			
		b	"	"			
		c	"	"			
		d	3745-56-74	265.184			
		e	3745-56-78	265.198			
		f	3745-56-79	265.199			
23	VI	A	3745-52-40	262.40			
		B	3745-52-41	262.41			
	VII	1a	3745-52-50	262.50			
		b	"	"			
		c	"	"			
		2	"	"			
24	X	I	3745-53-22	263.22			
		II A	3745-53-20	263.20			
		B	"	"			
	V	A	3745-53-10	263.10			
		B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.